

# Exhibit B

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KATHERINE CALAVAN, individually and )  
On behalf of all others similarly situated, )

Plaintiff, )

v. )

FIRST LOVE INTERNATIONAL )  
MINISTRIES, STEVEN JOHNSON, )  
JERRY WINSLOW, PAUL LONER, )  
PHILIP GUSKE, ROBERT OPPERMAN, )  
PHOEBE WILHELM, DALE GRAY, )  
THOMAS CLINTON, ROBERT )  
CLINTON, LOVING INDEED, INC., and )  
JOHN DOE CO-CONSPIRATORS 1-100, )

Defendants. )

No. 21-CV-00185

JURY TRIAL DEMANDED

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AFFIDAVIT OF [REDACTED]

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I, [REDACTED] resident of Nairobi whose address for the purposes of this suit is c/o Elizabeth Kabari P.O. Box 67978-00200, Nairobi Email: [elizabeth@kabari.org](mailto:elizabeth@kabari.org), DO make oath and swear as follows:

1. I am an adult female of sound mind and disposition. I am a citizen and resident of Kenya.
2. I work for Stahili Foundation (hereinafter "**Stahili**") which is a community-based organisation registered and working in Kenya which helps children and young adults who are in need of care, protection and support. Stahili works towards changing care systems by working with government and local communities to support family- and community-based alternatives to orphanages.
3. Stahili's work in Kenya involves helping children get home from orphanages and providing holistic support to strengthen families and create opportunities for education and sustainable development. Attached herein and marked as "**PW-1**" is a certified copy of Stahili's certificate of registration.

4. I work at Stahili as a social worker in the Leaping Gaps Programme. The Leaping Gaps programme is a programme that helps care leavers who are leaving charitable children's organisations (hereinafter "CCIs") transition into life outside the institution and become independent adults who can support themselves and participate in society.
5. I have a degree in Community Development from St. Paul's University. Attached herein and marked as "PW-2" is a certified copy of my degree certificate.
6. I met [REDACTED] in November 2020 when she was seeking to join the Stahili's Leaping Gaps programme. She explained to me her background which included:
  - 6.1. How she came under the care of First Love Kenya (hereinafter "FLK");
  - 6.2. How she was kicked out of the FLK's houses on numerous occasions the last of which was in February 2020 when she was kicked out of Daraja House;
  - 6.3. The mistreatment and abuse she was suffering at her guardian's home; and
  - 6.4. The assistance she was seeking from Stahili namely: support and guidance in starting her own business so that she could become financially independent and leave her guardian's home.
7. From her story, I noted that the only support that [REDACTED] was receiving from FLK was assistance in paying her school fees.
8. This support was insufficient because [REDACTED] still lacked:
  - 8.1. Transport money for school;
  - 8.2. Money for basic needs such as menstrual hygiene products;
  - 8.3. Psychosocial support which was necessary in her case because of the mistreatment and verbal abuse that she was receiving from her guardian [REDACTED] (hereinafter "[REDACTED]"), and [REDACTED]'s daughter; and
  - 8.4. Support and guidance to enable her to transition from the unsafe and harmful environment at [REDACTED]'s house.
9. I admitted her into Stahili's Leaping Gaps programme and Stahili began to provide her with all the above support.
10. In early March 2021, [REDACTED] requested me to help her leave [REDACTED]'s house because she could no longer handle the abuse and mistreatment she was suffering from [REDACTED] and [REDACTED]'s daughter. I therefore arranged to conduct a home visit to speak with [REDACTED] and map out with her and [REDACTED] the process of [REDACTED]'s transition out of [REDACTED]'s home.



11. This meeting was held on Monday 8<sup>th</sup> March 2021. The meeting was held at [REDACTED]'s place of work, that is, at Raila Educational Centre, Kibera. [REDACTED] had refused to meet us at her home and would only agree to meet us at the school.
12. During the meeting, I witnessed the dismissive and abusive ways in which [REDACTED] treated [REDACTED]. At the end of the meeting, [REDACTED] stated that she would not allow [REDACTED] to leave her home.
13. Three days after the meeting, that is, on Thursday 11<sup>th</sup> March 2021, [REDACTED] sent me a text message at approximately 11pm to inform me that [REDACTED] had kicked her out of the home.
14. I called [REDACTED] early the next day and she informed me that she had slept at a neighbour's place.
15. On 12<sup>th</sup> March 2021, [REDACTED] was allowed to return for her belongings at [REDACTED]'s house and we found her a place to stay and that is where [REDACTED] has been living ever since.
16. As a result of my training and experience I know that [REDACTED] ended up in an abusive and harmful living situation because either:
  - 16.1. FLK were negligent and did not conduct the due diligence which CCI's are required to do before releasing a care giver to a guardian.; or
  - 16.2. In the alternative, FLK knew about the conditions at [REDACTED]'s house and endangered [REDACTED] on purpose by forcing her to return to [REDACTED]'s house.
17. I learned that FLK were harassing and trying to intimidate [REDACTED] on 14<sup>th</sup> April 2021 when I called her to check on her. I had called her to check on her on 7<sup>th</sup> April 2021, but she did not take my call or call me back.
18. During the call on 14<sup>th</sup> April 2021, [REDACTED] told me about the meeting with FLK and the allegations and accusations that FLK made against Katherine Calavan, Stahili and [REDACTED].
19. [REDACTED] also told me about FLK's attempts to emotionally blackmail her into not talking to me or anyone else about the substandard care she received at FLK and the unscrupulous practices that she had witnessed during her time there.
20. I am also aware of FLK's subsequent attempts to get [REDACTED] to attend another meeting because [REDACTED] has told me about them and they have been happening. The most recent attempt was on 28<sup>th</sup> April 2021. Attached herein and marked as "PW-3" is a certified copy of my call logs with [REDACTED].
21. In addition to being [REDACTED]'s social worker, I am also the social worker to other care leavers who were abandoned by FLK. Some of these care leavers are also being harassed by FLK.



22. One care-leaver has been called to FLK on more than one occasion and each time they have badgered her to tell them what she knows about Stahili and Katherine Calavan. They have also forbidden her from talking about her time at FLK.
23. Unfortunately, this care leaver's sibling is still in FLK's care and therefore the care leaver has refused to come forward because she fears FLK will retaliate against her sister.
24. I have read the contents of the application herein, and the same have further been explained to me by my counsel and I affirm that the same are correct and in support thereof I swear this affidavit.
25. I have deponed this affidavit in support of the application based on facts within my knowledge and those I firmly believe to be true in accordance with the Oaths and Statutory Declarations Act, Cap 20, Laws of Kenya.
26. That what is deponed herein is true to the best of my knowledge, information and belief save wherein the source of my information is expressly stated.

Sworn at Nairobi )

This 20<sup>th</sup> day of May 2021)

[REDACTED]



[REDACTED]  
DEPONENT

I CERTIFY that [REDACTED] the deponent of this affidavit appeared before me on the [REDACTED] day of [REDACTED] Two Thousand and Twenty-One and acknowledged the above signature to be hers and that she had freely and voluntarily deponed this affidavit and understood its contents.



DRAWN BY: -

Elizabeth Nyaguthii Kabari

Advocate of the High Court of Kenya

Counsel for the Deponent

P.O. Box 67978-0200

Email: elizabeth@kabari.org

“PW-1”

FORM 5

REPUBLIC OF KENYA

(r.11)



OP.218/051/15-085/10939

OFFICE OF THE PRESIDENT



MINISTRY OF INTERIOR AND CO-ORDINATION OF NATIONAL GOVERNMENT

## CERTIFICATE OF REGISTRATION

I, **FAZUL YUSUF MAHAMED**, Executive Director of the Non-Governmental

Organizations Board, certify that **xxx STAHILI FOUNDATION KENYA xxx**

..... has this day been registered under  
section 10 of the Non-Governmental Organizations Co-ordination Act as applied for.

Dated **24TH JANUARY, 2018**

  
**FAZUL Y. MAHAMED**

.....  
*Executive Director of the Board*

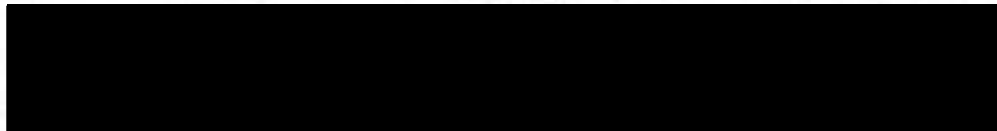


“PW-2”



# ST. PAUL'S UNIVERSITY

*This is to Certify that*



having satisfied all the requirements  
for the degree of

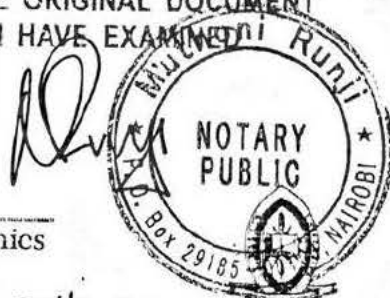
**BACHELOR OF ARTS IN COMMUNITY DEVELOPMENT**

*Second Class Honours, Upper Division*

was awarded the degree on the

*5<sup>th</sup> day of October in the year 2018*

I CERTIFY THAT THIS IS A TRUE  
COPY OF THE ORIGINAL DOCUMENT  
WHICH I HAVE EXAMINED



20<sup>th</sup> May 2021

Deputy Vice Chancellor Academics

Vice Chancellor

“PW-3”



